

MR. JEFFREY ALONZO SIMMS #198625

(PLAINTIFF)

V.

(DEFENDANTS)

DOCTOR DONNA BURNS, M.D.

MR. HARRY M. FREEMAN M.D. ORTHOPEDIC

ASSOCIATE COMMANDER COL. L. AARON

CHAFFINCH AND
STATE POLICE STAFF

LT. COL. THOMAS F. MACLEISH

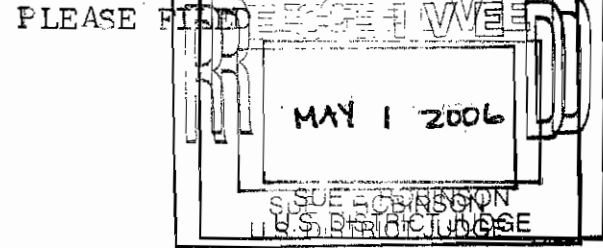
MAJOR R. L. HUGES OF THE DELAWARE

STATE POLICE

CIVIL ACTION CASE

04-1205 SLR

DATED APRIL 27-2006



MOTION

THE PLAINTIFF HAS PROVED ITS DAMAGES

EXHIBIT A, B, C, D,

MAY IT PLEASE THE COURT, ON THIS DAY IN THE ABOVE CAPTION CASE IN RESPECT TO THE HONORABLE JUDGE SUE L. ROBINSON OF THE UNITED STATES DISTRICT COURT AND MR. PETER T. DALLEO: (LOCK BOX 18 844 KING STREET WILMINGTON DELAWARE 19801-3570.

EXHIBIT A, THE DECISION IN THIS CASE EXPANDS FEDERAL HABEAS CORPUS REVIEW OF RELIEF GOVERNING STATE CONVICTIONS MR. SIMMS HAS REMAINED IN CUSTODY THROUGHOUT THE FEDERAL PROCEEDINGS IN-FACT THE RECORDS WILL REFLECT STATE PROSECUTORS DEPARTED FROM THE ACCEPTED CONSTITUTIONAL PRINCIPLES AND STATUTORY REQUIREMENTS AS TO CALL FOR REVIEW BY THIS COURT.

EXHIBIT B, GIVEN THE FINDING, THE MISCONDUCT INVOLVING THE DEFENDANTS AS NOTED, TO OVERCOME THIS INESCAPABLE CONCLUSION MR. SIMMS REQUEST THAT THE CHIEF JUDGE SUE L. ROBINSON SERIOUSLY GRANT RELIEF, AND EXONERATE THE CLAIMANT SENTENCE; (ORDER BY THE HONORABLE JUDGE, MR. RICHARD STOKES OF THE SUPERIOR COURT OF SUSSEX COUNTY DELAWARE P.O. BOX 756 GEORGETOWN, DELAWARE 19947, CASE 0207014771.)

EXHIBIT C, IN THE PENOLOGY SYSTEM OF THE DEPARTMENT OF CORRECTION, THE STATE OF DELAWARE (MR. HARRY M. FREEMAN M.D. SURGERY, ORTHOPEDIC AS A DEFENDANTS IN THE CASE AND DONNA BURNS CHIEF DOCTOR OF THE DEPARTMENT OF CORRECTION HERE IN DELAWARE PENAL CODE SYSTEM CO-EXIST IN THE DENIAL URGENT MEDICAL CARE AND TREATMENT OF THE PLAINTIFF THE RECORDS WILL REFLECT A PREPONDERANCE OF EVIDENCE JULY 21-2002.

EXHIBIT D, ON THE ABOUT DATE AND TIME JULY 21-2002, 3.00P.M. THE DELAWARE STATE POLICE DID UNLAWFULLY CAUSE DENIAL OF MEDICAL TREATMENT THE RECORDS REFLECT THE FINDINGS. SINCERLEY

MOVANT

MR. JEFFREY ALONZO SIMMS
MR. JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA DELAWARE 19977

DATED APRIL 27-2006

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON DELAWARE

CIVIL ACTION 04-1205 SLR

DATED APRIL 27-2006

2346.

CERTIFICATE

OF

SERVICE

I, JEFFREY ALONZO SIMMS, HEREBY SENT TRUE COPIES THREW THE UNITED STATES POSTAL SERVICE ON APRIL 27-2006, FIRST CLASS MAIL, AND CONTACTED ALL PARTIES THREW THE UNITED STATES POSTAL SERVICE IN THE ABOVE CIVIL ACTION CASE. SINCERLEY,

PLEASE BE ADVISED A MOTION HAVE BEEN FILED IN THE ABOVE CAPTION CASE, (CERTIFICATION OF RECORD ON REVIEW SECTION 2112 OF THIS TITLE)

ATTORNEY GENERAL:
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WILMINGTON, DELAWARE 19801.

SUPERIOR COURT OF SUSSEX COUNTY
HONORABL JUDGE RICHARD STOKES
P.O. BOX 756

GEORGETOWN, DELAWARE 19947
(CASE 0207014771)

DEPUTY ATTORNEY GENERAL
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UNITED STATES DISTRICT COURT
OF WILMINGTON DELAWARE
HONORABLE CHIEF JUDGE
SUE L. ROBINSON AND U.S.D.C.
CLERK MR. PETER T. DALLEO
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